

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

PUBLIC EMPLOYEES' RETIREMENT
SYSTEM OF MISSISSIPPI, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

MOHAWK INDUSTRIES, INC., and
JEFFREY S. LORBERBAUM,

Defendants.

Civ. A. No. 4:20-00005-ELR

**DECLARATION OF ROBERT R. LONG IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS CONSOLIDATED CLASS ACTION COMPLAINT**

I, Robert R. Long, declare as follows:


1. I am over 18 years of age and am competent to testify as to the matters stated in this Declaration. I am a member of good standing of the Georgia and California bars and have been admitted to practice in this Court. I am a member at the law firm of Alston & Bird LLP and am counsel for Defendant Mohawk Industries, Inc. I hereby submit this Declaration in support of Defendants' Motion to Dismiss the Consolidated Class Action Complaint for Violations of the Federal Securities Laws. I have personal knowledge of the facts set forth herein.

2. Attached as Exhibits A through D to this Declaration are true and correct copies of the following documents:

- **Exhibit A:** Mohawk Form 10-K, dated Feb. 28, 2020.
- **Exhibit B:** Letter to Shareholders, Excerpt of Mohawk 2018 Annual Report, available at http://www.corporatereport.com/mohawk/2018/ar/Mohawk_2018_Annual_Report.pdf.
- **Exhibit C:** Mohawk Press Release, Mohawk Industries Inc. Announces Purchase of IVC Group, dated Jan. 13, 2015.
- **Exhibit D:** Letter to Shareholders, Excerpt of Mohawk 2019 Annual Report, available at <https://ir.mohawkind.com/static-files/250e3467-50b7-4c7c-8397-67d515deb533>.

3. Pursuant to 26 U.S.C. § 1746, I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed on October 27th, 2020, in Atlanta, Georgia.



Robert R. Long
Georgia Bar No. 141546

LOCAL RULE 7.1D CERTIFICATION

By signature below, counsel certifies that the foregoing document was prepared in Times New Roman, 14-point font in compliance with Local Rule 5.1C.

Robert R. Long

Robert R. Long

Georgia Bar No. 141546

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of October, 2020, I electronically filed the foregoing DECLARATION IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S CONSOLIDATED CLASS ACTION COMPLAINT with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing upon Counsel of Record.

This 27th day of October, 2020.

Robert R. Long

Robert R. Long

Georgia Bar No. 141546